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October 26, 2021

Honorable William F. Kuntz
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

CONSENT Letter Motion, by ECF

RE: United States v. Ppassim Elder, et al., 18 Cr. 92 (WFK)

Your Honor:

I am writing on behalf of both defendants, Ppassim Elder and Wilbert Bryant and all defense counsel, to respectfully request a modification of the schedule for filing a post-verdict motion pursuant to Rule 29(c) by ten days or so.

The reason for the request is that I am actually engaged on trial in Queens Supreme Court on a criminal case, and the trial will not be completed until the end of this week (at the earliest), which leaves me very little time to prepare a motion and to review it with my client before filing on the current schedule (November 1, 2021).

I have consulted with the government attorneys, who have no objection, and with Mr. Bryant's attorneys, who join in the motion.

The proposed schedule would be as follows:

Defendants to file their motions on or before November 10, 2021 by 5:00pm..

The government would file their response on or before December 13, 2021 by 5:00pm.

Defendant's to file any reply papers on or before December 30, 2021 by 5:00pm.

I thank Your Honor for your consideration of this request.

Sincerely,

/s/ Thomas H. Nooter

Attorney and Co-Counsel for Defendant
Ppassim Elder

cc: All counsel, by ECF